

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

GARY KEIFER

§  
§  
§  
§  
§

VS.

CIVIL ACTION NO. 2:15-cv-00123

PASCHALL TRUCK LINES, INC. and  
DARRIUS BARLOW

§

**DEFENDANTS, PASCHALL TRUCK LINES, INC and DARRIUS BARLOW'S  
NOTICE OF REMOVAL**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS:

Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendants, **PASCHALL TRUCK LINES, INC and DARRIUS BARLOW**, hereby removes this action to the United States District Court for the Southern District of Texas from the 36th Judicial District Court of San Patricio County, Texas, stating as follows:

1. Plaintiff, Gary Keifer, commenced this action in the 36th Judicial District Court of San Patricio County, Texas, where it was given Cause No. S-14-6312CV-A. This action is between citizens of different states. Plaintiff is a resident of Texas. Defendant Paschall Truck Lines, Inc. is a Kentucky Corporation and Defendant Darrius Barlow is a resident of Georgia. Further, Plaintiff claims damages for serious personal injury and is seeking damages of \$1,000,000. Accordingly, this Court has original jurisdiction under 28 U.S.C. § 1332.

2. Defendants, Paschall Truck Lines, Inc. and Darrius Barlow received the summons and complaint on February 25, 2015, so this removal is timely under 28 U.S.C. § 1446(b).

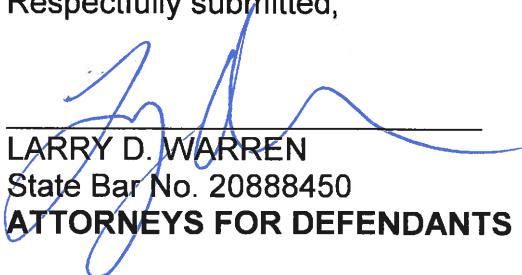
3. A copy of all process, pleadings, and orders served upon Defendant is attached as Exhibit A.

4. Defendant has provided written notice of this Notice of Removal to all adverse parties and has filed a copy with the Clerk of the 36th Judicial District Court of San Patricio County, Texas.

5. Defendants Paschall Truck Lines, Inc. and Darrius Barlow consents to the removal.

Dated: \_\_\_\_\_, 2015

Respectfully submitted,

  
LARRY D. WARREN  
State Bar No. 20888450  
ATTORNEYS FOR DEFENDANTS

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 13 day of March 2015, the foregoing was filed with the Clerk of Court using the CM/ECF system, and was served on counsel:

**E-Filing Notification System:**

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Wade B. Reese  
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**ATTORNEYS FOR PLAINTIFF**

LARRY D. WARREN